

DECLARATION OF KENNETH LONG

I, KENNETH LONG, declare as follows:

1. I am over 18 years of age and a resident of the State of California. The matters set forth herein are based on my personal knowledge.

2. On March 15, 1990, Gerald Armstrong ("Armstrong") executed a declaration in the above-captioned case. His declaration was filed in support of plaintiff's Motion for an Order Directing Non-Interference with Witnesses and Disqualification of Counsel and, in paragraphs 22-31, 33-35 and 38-39, Armstrong referred to several affidavits I executed in October, 1987.

3. The crux of Armstrong's complaint about those affidavits is probably found at paragraph 35 of his declaration. There, Armstrong quotes from an affidavit I executed on October 7, 1987, and in which I described my January, 1987 discovery that Armstrong had knowingly violated orders issued by Los Angeles Superior Court. Taken together, my October, 1987 affidavits demonstrate that:

a. In August, 1982, Armstrong was ordered by Judge John L. Cole to surrender certain documents and materials to the custody of the Clerk of the Los Angeles Superior Court.

b. Armstrong later attested, on numerous occasions, that he had surrendered all such documents and materials, and that he had none in his possession.

c. In January, 1987, following settlement of

1        Scientology of California ("CSC"), Armstrong  
2        turned over to CSC all Church-related documents in  
3        his possession. I personally inspected the  
4        documents turned over by Armstrong, and found a  
5        number of copies of the documents which Armstrong  
6        had previously sworn that he had surrendered to  
7        the Clerk of the Court.

8            d. Based on my discovery of these documents,  
9        I concluded that Armstrong had intentionally  
10        perjured himself on numerous occasions, and had as  
11        well knowingly violated orders issued by judges at  
12        all levels ranging from the Los Angeles Superior  
13        Court to the Supreme Court of the United States.

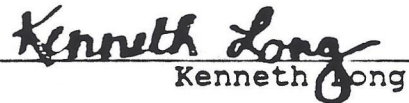
14        4. These affidavits were executed in the case of Church  
15        of Scientology of California v. Russell Miller and Penguin  
16        Books, Limited ("Miller"), Case No. 6140 in the High Court  
17        of Justice located in London, England. In Miller, CSC sued  
18        author Russell Miller and his publisher Penguin Books for  
19        breach of confidence arising out of Miller's use of some of the  
20        documents described in paragraph 2 above. Under United Kingdom  
21        legal procedure, since CSC had made out a prima facie case for  
22        breach of confidence against Armstrong in Church of  
23        Scientology of California and Mary Sue Hubbard v. Gerald  
24        Armstrong, LASC Case No. C 420153, it was possible to extend  
25        that breach of confidence claim to Miller and Penguin Books by  
26        linking them to Armstrong. The affidavits, therefore, were  
27        required to detail the elements of the breach of confidence  
28        claim against Miller and Penguin, and the claim could not have

1 been brought without explaining the underlying actions taken by  
2 Armstrong.

3 5. There is no provision in the settlement agreement with  
4 Armstrong which would prohibit CSC from using information  
5 obtained through litigation with Armstrong in seeking legal  
6 remedies for wrongs committed by third parties.

7 I declare under penalty of perjury under the laws of the  
8 State of California that the foregoing is true and correct.

9 DATED: March 26, 1990

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12 Kenneth Long  
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